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12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 B DIAMOND INFRA LLC,

16 Plaintiff,

17 v.

18 CARMEN FERCH, AS TRUSTEE OF
19 THE CARMEN FERCH TRUST, and the
20 FEDERAL AVIATION
21 ADMINISTRATION,

22 Defendants.

23 Case No. 3:22-cv-00443-LRH-CSD

24 **Stipulation to Extend the United States'**
25 **Deadline to Answer**

26 **(First Request)**

27 Pursuant to Local Rule IA 6-1, the parties stipulate and request that Defendant
28 United States of America shall have a 60-day extension of time to file an answer or
otherwise respond to Plaintiff's Complaint. (ECF No. 1). Based on the date of service of
the summons and complaint on the United States, the answer or other response is due by
December 12, 2022. With the extension, the new deadline to answer or otherwise respond
would be **February 10, 2023**. This is the United States' first request for extension.

29 The parties are working diligently to verify important facts, discuss this matter with
30 interested parties, and determine whether they can resolve this matter without litigation.
31 The parties agree that a 60-day extension of the United States' answer deadline is
32 appropriate under the circumstances. This stipulation is filed in good faith and not for the
33 purpose of delay.

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1 WHEREFORE, the parties respectfully requests that this stipulation be granted and
2 that the deadline to respond to the complaint be extended from December 12, 2022,
3 through and including **February 10, 2023**.

4 Respectfully submitted this 9th day of December 2022.

5 HOLLAND & HART LLP

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6 United States Attorney

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15 *Attorney for Defendant Carmen Ferch as
Trustee of the Carmen Ferch Trust*

16 IT IS SO ORDERED:
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19 
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: December 12, 2022